

**RESPONSE TO THE MAY 17, 2017 ORDER TO SHOW CAUSE
FILED ON BEHALF OF DEFENDANTS: THE HONORABLE PAMELA
DEMBE, IN HER OFFICAL AND INDIVIDUAL CAPACITY, IN NO. 13-
4066, AND NICHOLAS FORD, STEFFEN BOYD, JOSETTE SPRINGER,
SHONDA WILLIAMS, JOHN HARRISON, E. MARTINEZ,
STEVEN AUSTIN, DARLENE MILLER AND CHARLES HOYT,
IN THEIR OFFICIAL CAPACITIES, IN NO. 15-4745**

NOW COME Defendants, the Honorable Pamela Dembe, in her official and individual capacity, in case No. 13-4066, and Nicholas Ford, Steffen Boyd, Josette Springer, Shonda Williams, John Harrison, E. Martinez, Steven Austin, Darlene Miller and Charles Hoyt, in their official capacities, in case No. 15-4745, who respectfully respond to this Honorable Court's May 17, 2017 Order to show Cause why the above-captioned cases should not be consolidated:

i. Claims remaining in the cases

NO. 13-4066

The undersigned represents only the Honorable Pamela Dembe, who is not a party to No. 15-4745. Judge Dembe's Motion to Dismiss was granted on January 17, 2014, and Plaintiff's Motion for Reconsideration was denied on March 28, 2014. There are no claims remaining as to Judge Dembe. The remaining claims pertain to Probation Officer Nicholas Ford, about whose supervision Plaintiff complains.

NO. 15-4745

The undersigned represents Defendants, all of whom are employees of the Philadelphia Adult Probation and Parole Department, in their official capacities only. The District Court dismissed those claims, and the Third Circuit Court of Appeals affirmed that dismissal in its December 23, 2016 Opinion. There are no

claims remaining as to Defendants in their official capacities. The remaining claims pertain to Defendant Ford in his individual capacity.

ii. Position as to Consolidation

All claims against the individuals represented by the undersigned have been dismissed. Since the only claims remaining pertain to individual capacity claims as to Probation staff and the manner in which Plaintiff alleges he was supervised while on probation, there does not appear to be a reason that the cases should not be consolidated.

Respectfully submitted,

/s/ Martha Gale

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT THIRD CIRCUIT

JASON COLLURA

Plaintiff

v.

NICHOLAS JAMES FORD *et al.*

Defendants

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CIVIL ACTION

NO. 13-4066

J.C.

Plaintiff

v.

NICHOLAS FORD *et al.*

Defendants

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CIVIL ACTION

NO. 15-4745

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on June 8, 2017, she personally caused to be served upon the following a true and correct copy of the foregoing *Response to the May 17, 2017 Order to Show Cause* via CM/ECF to all counsel of record and by mailing same first class, postage pre-paid, U.S. mail to:

Jason Collura
P.O. Box 934
Philadelphia, PA 19105
Pro Se Plaintiff

/s/ Martha Gale

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*Attorney for Appellees, Nicholas Ford,
Steffen Boyd, Josette Springer, Shonda
Williams, John Harrison, E. Martinez,
Steven Austin, Darlene Miller and Charles
Hoyt, in their official capacities*